

From: [Tim Stroshane](#)
To: [Billington, Tracie; scouch@waterboards.ca.gov;](#)
CC:
Subject: Comments on Sacramento Valley Integrated Regional Water Management Plan
Date: Wednesday, February 07, 2007 9:32:03 PM
Attachments:

To whom it concerns:

I write to urge the California Department of Water Resources and the State Water Resources Control Board not to fund the Northern California Water Association's proposed Sacramento Valley Integrated Regional Water Management Plan.

This proposal is not worthy of Proposition 50 planning grant funding for a number of reasons.

- As a plan for water management it is neither integrated nor regional in its scope. It is a plan by and for water interests, intended to benefit water right-holding interests only.
- The opportunities and constraints for integrated regional water management planning in the Sacramento Valley are at best unclear. Opportunities for water conservation by farm and ranching interests are not included. Constraints on groundwater development, such as the upslope protection of vernal pools, valley oak savannahs, and other east-side Sacramento Valley resources are ignored.
- For the most part, the plan asserts benefits of their vision for water management through groundwater pumping, water exchanges, and unproven technological fixes like fish screens passing as ecosystem restoration strategies without demonstrating that these strategies actually do effectively lead to improved water management.
- The Plan lacks a real grassroots base of support in the Valley. Even the conservation interests cited by the NCWA are made up of groups like the Natural Heritage Institute represent people from outside the Sacramento Valley. Contacts of mine in the Chico area tell me that NCWA has preferred not to engage in a sincere and good faith effort to do a broad-based, inclusive planning process about water resources. This seems to reflect the Association's agenda as a water industry trade organization asserting its interests and setting the public agenda for water resources policy in the Sacramento Valley.

I urge you to withdraw proposed funding for NCWA's IRWMP at least and until the Association embarks on a good-faith planning process, the outcome of which would not be prejudged by water interests who believe they "own" the water. Water is a community resource; by California's system of water and environmental law, water right holders must be responsible not only to each other but to the rivers, streams and aquifers that every community relies on. The NCWA IRWMP fails to place this community value of water at its core, and therefore should be sent back to the drawing board and the planning bodies of the Sacramento Valley for significant revision and new community input – broad-based and inclusive input gathered in good faith.

Thank you for the opportunity to comment on this important issue.

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